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Rock Fuel Media, Inc.

8
9 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 RESORTS WORLD LAS VEGAS LLC, a
Delaware limited liability company,

11 Plaintiff,

12 vs.

13 ROCK FUEL MEDIA, INC., a California
corporation,

14 Defendant.

15 ROCK FUEL MEDIA, INC., a California
corporation,

16 Counterclaimant,

17 vs.

18 RESORTS WORLD LAS VEGAS LLC, a
Delaware limited liability company, and DOE
21 and ROES 1-X are unknown or not yet
confirmed,

22 Counterdefendants.

Case No. 2:21-CV-02218-JAD-VCF

**STIPULATION AND ORDER TO EXTEND
DEADLINE TO FILE REPLY BRIEF IN
SUPPORT OF:**

- 1) **DEFENDANT/COUNTERCLAIMANT
ROCK FUEL MEDIA, INC.'S MOTION
TO VACATE THE CLERK'S DEFAULT
[ECF NO. 71]; AND**
- 2) **MOTION TO EXTEND TIME TO
OPPOSE MOTION FOR DEFAULT
JUDGMENT [ECF NO. 72]**

(FIRST REQUEST)

ECF No. 80

Pursuant to LR IA 6-1 and LR 7-1 Plaintiff/Counterdefendant Resorts World Las Vegas LLC (“Resorts World”) and Defendant/Counterclaimant Rock Fuel Media, Inc. (“Rock Fuel”) (collectively, the “Parties”) hereby stipulate and agree as follows:

1. On October 2, 2023, Rock Fuel filed its Motion to Vacate the Clerk’s Default (ECF No. 71) and, if Necessary, (1) Motion to Extend Time to Oppose Motion for Default

1 Judgment (ECF No. 72); and (2) Opposition to Motion for Default Judgment. (ECF No.
2 73.)
3 2. On October 16, 2023, Resorts World filed its Response in Opposition to Motion to
4 Vacate Clerk's Default (ECF No. 78), and its Response in Opposition to Motion to
5 Extend Time to Oppose Motion for Default Judgment. (ECF No. 79.)
6 3. The parties have agreed to **extend the deadline for Rock Fuel to file a reply brief in**
7 **support of** its (1) Motion to Vacate the Clerk's Default (**ECF No. 71**) and (2) Motion to
8 Extend Time to Oppose Motion for Default Judgment (**ECF No. 72**) by fourteen (14)
9 days – extending the deadline **from Monday, October 23, 2023, to Monday, November**
10 **6, 2023** – due to scheduling conflicts of the undersigned counsel for Rock Fuel
11 a. Specifically, Rock Fuel's current counsel is trial counsel in a three-week jury
12 trial in the Eighth Judicial District for the State of Nevada (*James W. Vahey,*
13 *M.D., et al., vs. Black & LoBello, et al.*, Case No. A-48-768351-C, Dept. 26.)
14 that is not estimated to finish until the end of October.
15 4. This is the first request for an extension related to the briefing on the Motion.
16 5. This Stipulation is entered into in good faith and not for purposes of delay.

17 DATED this 19th day of October, 2023.

18 **GREENBERG TRAURIG, LLP**

19 By: /s/ Bethany L. Rabe

20 MARK G. TRATOS
BETHANY L. RABE
KIMBERLY J. COOPER

21 Attorneys for Plaintiff/Counterdefendant

DATED this 19th day of October, 2023.

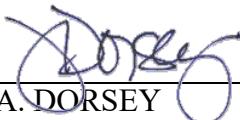
BAILEY♦KENNEDY

By: /s/ Tayler D. Bingham

DENNIS L. KENNEDY
TAYLER D. BINGHAM

Attorneys for Defendant/Counterclaimant

23 **IT IS SO ORDERED.**

24
25
26 
JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

27 Dated 11/6/23, *nunc pro tunc* to 10/23/23